

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

WILLIE HENDERSON, )  
INDIVIDUALLY AND ON BEHALF OF )  
ALL OTHERS SIMILARLY SITUATED, )  
Plaintiff )  
v. )  
GENERAL REVENUE CORPORATION, )  
And )  
PIONEER CREDIT RECOVERY, INC. )  
Defendants. )  
)  
**MOTION TO COMPEL**

COMES NOW Plaintiff, through counsel, pursuant to Federal Rule of Civil Procedure 37 and respectfully moves that this Court compel Defendant GRC to respond to discovery requests served on October 3, 2017. As set forth in detail in the Memorandum of Law in Support of the Motion to Compel filed herewith and incorporated by reference herein, Defendant GRC has failed to make a proper response to discovery requests and Plaintiff's efforts to resolve the matter short of court intervention have been unsuccessful. For these reasons and those set forth in the accompanying Memorandum of Law, Plaintiff respectfully requests that the Court grant the motion to compel.

Respectfully submitted,

WILLIE HENDERSON, individually and on behalf of all others similarly situated

By: /s/ Monica L. Mroz

Of Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following counsel for defendants:

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